## REMARKS

The examiner is thanked for the performance of a thorough search.

Claims 1, 12, 22, 32, and 42 have been amended. No claims have been added or cancelled. Hence, Claims 1-3, 5-14, 16-24, 26-34, 36-42 are pending in the application.

The amendments to the claims as indicated herein do not change the scope of any claim. In particular, the amendments made to Claims 1, 12, 22, 32, and 42 have been made to improve readability and to clarify the term "normative concept", which term was present in the claims as originally filed.

Each issue raised in the Office Action mailed January 27, 2005 is addressed hereinafter.

I.      CLAIM 1

The Office Action has rejected Claim 1 as allegedly anticipated under 35 U.S.C. § 102(b) by POVILUS, U.S. Patent No. 5,740,425 ("POVILUS"). The rejection is respectfully traversed.

Among other features, Claim 1 recites:

...

designating a first concept of the first plurality of corresponding concepts as a normative concept, wherein the normative concept is used to relate the single entity to other entities of the enterprise;

...

in response to receiving the request, sending a response including content of a file that is associated in the database with the first concept.

It is respectfully submitted that POVILUS does not describe these two features.

1.      <u>POVILUS does not describe the feature of designating a first concept of the plurality of corresponding concepts as a normative concept that is used to relate the single entity to other entities of the enterprise.</u>

In the page 16, lines 10-12 of the present Application, it is stated that "[a]ccording to an embodiment of the invention, two or more concepts may be related as alternative names for the

same underlying enterprise entity, such as a product, service, or activity of the enterprise." The

present application also states that "[t]o reflect such relationships, each name is treated as a

different concept, and the several names for the same entity are connected by relationships of a

type 'is an alternative name for.'" (Page 16, lines 17-19.) The present application further states,

in page 16, lines 19-22, that

> According to one embodiment described below, one of the concepts is designated
> the normative concept. The normative concept is used to relate the entity
> described to other entities of the enterprise, such as in the product type hierarchy.
> The other concepts referring to the same entity are alternative concepts.

Thus, in one embodiment, a normative concept is a concept that relates a particular entity to

other entities of the enterprise, as recited in the claims.

For example, in Table 2 on page 24 of the present application, concept "Beta Perseus 2.0"

is associated with a particular network router product, which is an entity of the enterprise.

Further, referring to Table 6, in page 27 of the present application, concept "BetaPerseus 2.0" is

selected as a normative concept. (Application, page 28, lines 10-11.) In Table 6, relationship

with RID of "5006" is established between normative concept "Beta Perseus 2.0" and alternative

concept "BP2". Further, in Table 6 the normative concept "Beta Perseus 2.0" is related to the

following enterprise entities:

- to its parent product "Beta Perseus 1.0" by relationship with RID of "5000",

- to a document with URL of
  http://www.Enterprise.com/literature/devices/catalog/Chap2/ by relationship with
  RID of "5001",

- to its child product "Beta Persesus 2.4" by relationship with RID of "5002",

- to a technician (Jane) and a technology area (private wide area net) by
  relationship with RID of "5003",

- to a document with URL of http://www.Enterprise.com/Hello/Chap2/ by
  relationship with RID of "5004",

- to several versions of the router entity by relationship with RID of "5005".

Thus, in this example, the normative concept "Beta Perseus 2.0" associates the entity of the

particular network router with a number of other entities of the enterprise, such as other products

(routers), documents, versions of products, and persons by whom, and technology areas where,

the entity of the particular router may be used.

In contrast, POVILUS does not describe any feature that corresponds to a normative

concept as claimed. In page 4, the Office Action incorrectly asserts that designating a concept as

a normative concept is described in col. 7, lines 10-25 of POVILUS. In col. 6, line 66 to col. 7,

line 22, POVILUS states:

> To allow an end user to interact with the electronic catalog so as to obtain the level and amount of information desired, the data structure includes means for creating a glossary for the electronic catalog. The glossary includes a plurality of phrases. A "Phrase" consists of one or more words which can be searched for explicitly or using wildcard search conventions of "*" and "?". A phrase can be related to any number of Definers, as described below. A Phrase includes data to indicate its language of expression (English, French, etc.). **One purpose of a Phrase's existence is to make it easy to locate related Definer(s), given some word(s) or word fragment(s). Another purpose is to locate potentially significant words (say, in a block of text), given a particular Definer of interest.**
> **A "Definer" is a phrase that has exactly one definition.** When a Definer is created, a synonym relationship is established with its own embodiment as a Phrase. In addition, a Definer may have any number of other synonyms, each of which is either a Phrase or the Phrase embodiment of some other Definer. **The purpose of a Definer's existence is to give meaning to nodes in a concept structure. This meaning provides a bridge of understanding between the provider of products and the seeker of products that are indexed (categorized) against concept structures.** (Emphasis added.)

Thus, the Office Action asserts that the plurality of names (for a single entity of the

enterprise) that is stored as a first plurality of corresponding concepts of Claim 1 corresponds to

the "Phrases" in POVILUS. Further, the Office Action asserts that the normative concept in

Claim 1 corresponds to the "Definer" in POVILUS. Therefore, in order to show the feature of

Claim 1 of designating a first concept as a normative concept that relates the single entity to other entities of the enterprise, the Office Action must also show that a "Definer" for an entity in POVILUS relates this entity to at least one other entity. POVILUS, however, does not disclose any such feature.

As shown in the passage from POVILUS quoted above, neither a "Phrase" nor a "Definer" relates any entities. The "Phrases" and "Definers" are used in a glossary to facilitate an easier search of an electronic catalog. More specifically, a "Phrase" is used to make it easy to locate a "Definer" by using a search that utilizes words or word fragments. Similarly, a "Definer", which is a "Phrase" with exactly one definition, is used to give meaning to nodes in a concept structure and to provide a bridge of understanding between the provider of the products and the seeker of the products represented in the concept structure. Further, while a "Definer" is "Phrase" that has a definition and "a unique association to a node in the concept structure for a product realm" (see POVILUS, col. 8, lines 28-29), the "Definer" does not have any means to relate a node, such a particular product in the product realm, to another entity, such as another product or service provided by the enterprise.

Furthermore, nothing in POVILUS describes any use of a "Definer" for relating an entity described by a "Definer" with other entities in the enterprise. For example, in FIG. 14 "Definer" 202 is associated to a concept representing a particular product by a "Use" relationship. There is no indication in FIG. 14, or anywhere else in POVILUS, that a "Definer" may be used to relate different concepts. Further, POVILUS indicates that it uses Stock Keeping Units (SKUs) of items (e.g. products) to relate the items to other entities in the database. For example, in reference to FIG. 16, POVILUS describes that a BaseSKU is used to create links between different products. (Col. 17, lines 40-41). Further, a BaseSKU "identifiers enable the product

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database to be linked to any number of other databases." (Col. 17, lines 46-48). POVILUS, however, does not even suggest that a "Definer" may be used in place of a SKU, or to relate different products or items.

Simply put, a "Definer" in POVILUS is used to describe the characteristics of a particular product that is represented as a node in the concept structure for a product realm. For example, "a product characteristic labeled 'highest' in the Distribution Systems product realm uses the Definer 'ultrapure' for its definition." (POVILUS, col. 8, lines 30-32.) In another example, "a product characteristic labeled 'low-density foam' in the Insulation product realm uses a Definer [] that has a synonymous phrase 'plastic ultralight foam'." (POVILUS, col. 8, 32-36.) In yet another example, in regards to FIG. 13, POVILUS states that "[a] Quantity 204 is a Definer 202 that represents a numerically measurable feature of a product, like an overall height, nominal voltage, maximum capacity, etc." (Col. 16, lines 23-25.)

For these reasons, it is abundantly clear that a "Definer", as taught by POVILUS, is used only to define and describe a characteristic of a product. Thus, a "Definer" cannot possibly be equivalent to a normative concept as featured in Claim 1, and relating a "Definer" to one or more synonym "Phrases" cannot possibly be equivalent to the feature of Claim 1 of designating a first concept of the plurality of corresponding concepts as normative concept that is used to relate the single entity to other entities of the enterprise.

2. <u>POVILUS does not describe the feature of sending, in response to receiving the request, a response including content of a file that is associated in the database with the first (normative) concept.</u>

In page 2, the Office Action rejected the Applicants' argument that POVILUS does not teach the feature of Claim 1 of "in response to receiving the request, sending a response

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including content of **a file associated in the database with the first concept**".

The above feature of Claim 1 recites that the response includes content not just from any file, but from a file that **is associated in the database with the first (normative) concept.** In other words, among other elements, the above feature of Claim 1 comprises: (1) a file and a normative concept that are associated in the database of concepts and relationships, and (2) a response that includes contents of the file.

In contrast, POVILUS does not describe any such feature. The Office Action equates the normative concept of Claim 1 with a "Definer" in POVILUS. Thus, in order to show the above feature of Claim 1, the Office Action needs to show that a "Definer" is associated in the database with a file. However, nothing in POVILUS indicates that a "Definer" may be associated with any files in the database. As pointed out above, a "Definer" is used only to define and describe a characteristic of a product. Nothing in POVILUS even suggests that the database may store any information that indicates an association between a "Definer" and a file.

Furthermore, in rejecting the Applicants' argument that POVILUS does not describe the above feature of Claim 1, the Office Action asserts that

> The passage cited in the Office Action teaches that a compact disc or other computer readable medium which at least in part comprises the database in question, is searched by the user (col.8, lines 7-11). It is **inherently true** of compact discs, particularly those that are usable as a computer readable medium as dictated by Povilus, that all data stored on such media are arranged into files. Consequently, any data pulled from the search query depicted in lines 10-65 **must necessarily** have come from a file on the CD, and is therefore "content of a file associated in the database with the first concept". (Emphasis added.)

Thus, in asserting that POVILUS inherently describes the above feature of Claim 1, the Office Action asserts that the search query against the POVILUS database returns data from a file on the CD that stores the database, which file is in fact associated, <u>in the database itself</u>, with a "Definer". In other words, the Office Action asserts that (1) the data is retrieved from a file

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that stores at least a portion of the database, and (2) the file is itself associated **IN THE**

**DATABASE** with some "Definer".

The Office Action, however, fails to show anything in POVILUS that describes that a

"Definer" may be associated in the database with a file that stores at least a portion of the

database. Moreover, the Applicants cannot find anything in POVILUS that even suggests that

the files that store the POVILUS database are in anyway referenced in the database itself, let

alone be associated in the database with a "Definer". For this reason, it is respectfully submitted

that the Office Action rejected the Applicants arguments by using a completely unsubstantiated

assertion.

Finally, while the Applicants agree that there exist some computer-readable media

formats that provide for storing data in files, the Applicants would like to point out that there are

many computer-readable media formats that do not provide for storing data in files, such as, for

example, audio CDs that store data (music) in tracks on the CDs. Thus, contrary to the assertion

in the Office Action, not all data stored on computer readable media is arranged in files.

Furthermore, POVILUS does not mention anywhere that the data structures and the database it

describes are arranged in files. For this reason, the Office Action **fails to establish** that any

results pulled by the search query described in col. 8, lines 10-65 of POVILUS **necessarily**

comes from a file on the CD.

Thus, it is respectfully submitted that POVILUS does not describe the feature of Claim 1

of sending, in response to receiving the request, a response including content of a file that is

associated in the database with the first (normative) concept.

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For the reasons stated above, POVILUS does not describe all features of Claim 1, and therefore Claim 1 is not anticipated under 35 U.S.C. § 102(b) by POVILUS. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

II.      INDEPENDENT CLAIMS 12, 22, 32, AND 42

Independent claims 12, 22, 32, and 42 have been rejected as allegedly anticipated under 35 U.S.C. § 102(b) by POVILUS.

Claims 12, 22, 32, and 42 include features similar to the features of Claim 1 discussed above. For this reason, it is respectfully submitted that Claims 12, 22, 32, and 42 are patentable under 35 U.S.C. § 102(b) over POVILUS for at least the reasons given above with respect to Claim 1.

III.     CLAIMS 11, 21, 31, AND 41

Dependent Claims 11, 21, 31, and 41 have been rejected as allegedly anticipated under 35 U.S.C. § 102(b) by POVILUS.

The Office Action rejected the Applicants argument that POVILUS does not teach the feature of Claims 11, 21, 31, and 41 of "wherein **the entities include the set of activities of the enterprise**; and wherein the set of activities of the enterprise include at least on of administration, research, marketing, joint ventures and documentation." Specifically, the Office Action states, in page 3, numbered paragraph 5, that "[a]lthough not explicitly referred as such, the actions described in the cited passage [POVILUS, col. 10, lines 25-40] clearly constitute 'research' under the broadest possible interpretation of that term." The Applicants respectfully disagree that the above passage, or any other passage of POVILUS for that matter, describes that the entities stored in the POVILUS database include entities representing the set of activities of the enterprise.

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In col. 10, lines 25-40, POVILUS states:

The display would also imply that there may be ultrasonic (node 118) level sensors that sense the level of a solid (node 114), and that sense only a single level (node 128) of liquid (node 112) in a tank.

> Once the computer has displayed a navigational path through the concept structure identifying products with the desired combination of characteristics, the lead engineer may instruct the computer to list the available products that have these characteristics. In reviewing the available product listing, the lead engineer would be able to recognize the name of a manufacturer, X, as the manufacturer associated with the pamphlet. The lead engineer may then cause the computer to display the product description content associated with the product manufactured by Manufacturer X. If, upon reviewing the detailed product characteristics, the lead engineer discovers that this product would require an above tank mounting clearance that is not possible given the positioning of the tank in the facility, which allows only 1/2 inch, the lead engineer may search for similar products having a desired maximum for clearance requirement.

Thus, in col. 10, lines 25-40 POVILUS describes an end user (a lead engineer) that performs a product realm search in the database claimed by POVILUS as his invention. Nothing in POVILUS, however, describes that **the activity of searching through a database is stored as an entity in that same database**. All the entities in the POVILUS' database are products and their characteristics, and nothing even suggests that the activities of an enterprise are tracked as entities in a database. (See POVILUS, col. 6, lines 48-62.) Thus, POVILUS does not teach that activities of an enterprise are stored as entities in a database, and consequently POVILUS necessarily fails to teach the feature of Claims 11, 21, 31, and 41 of "wherein the set of activities of the enterprise include at least on of administration, research, marketing, joint ventures and documentation."

For this reason, it is submitted that POVILUS does not teach all features of Claims 11, 21, 31, and 41, and reconsideration and withdrawal of the rejection of Claims 11, 21, 31, and 41 under 35 U.S.C. § 102(b) over POVILUS is respectfully requested.

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III.    CLAIMS 2-3, 5-11, 13-14, 16-21, 23-24, 26-31, 33-34, AND 36-41

Claims 2-3, 5-11, 13-14, 16-21, 23-24, 26-31, 33-34, and 36-41 have been rejected as

allegedly anticipated under 35 U.S.C. § 102(b) by POVILUS.

Claims 2-3, 5-11, 13-14, 16-21, 23-24, 26-31, 33-34, and 36-41 are dependent upon one

of independent Claims 1, 12, 22, and 32, and thus include each and every feature of their

corresponding base claim. Therefore, each of Claims 2-3, 5-11, 13-14, 16-21, 23-24, 26-31, 33-

34, and 36-41 is allowable for the reasons given above for Claims 1, 12, 22, and 32. In addition,

each of Claims 2-3, 5-11, 13-14, 16-21, 23-24, 26-31, 33-34, and 36-41 introduces one or more

additional features that independently render it patentable. However, due to the fundamental

differences already identified, to expedite the positive resolution of this case a separate

discussion of those features is not included at this time. Therefore, it is respectfully submitted

that Claims 2-3, 5-11, 13-14, 16-21, 23-24, 26-31, 33-34, and 36-41 are allowable for the reasons

given above with respect to Claim 1, 12, 22, and 32.

IV.    CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims

are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is

believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is

believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firms check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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